

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEM,
PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

**THIS DOCUMENT RELATES TO
ALL CASES**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

**NOTICE OF ORAL AND VIDEOTAPED DEPOSITION DUCES TECUM
OF ERIC ROVNER, M.D.**

To: Defendant ETHICON, INC. and Johnson & Johnson, Inc.

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure that Plaintiffs, by and through their counsel will take the videotaped deposition of Eric Rovner, M.D. on August 26, 2014 at 9:00 am EST at Wills Massalon & Allen, LLC at 97 Broad Street, Charleston, SC 29401. This deposition is being taken for the purposes of discovery and such other purposes as authorized by law. The deposition will be taken before a person authorized by law to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and shall continue from day to day until completed. Said deponent will bring the documents referred to in Schedule A attached hereto.

Respectfully Submitted,

/s/ Thomas P. Cartmell
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SCHEDULE A

1. All letters, e-mails, telecopies or other documents (including any attachments thereto) reflecting any communication that relates to this litigation and that was exchanged between Defendant manufacturers or any attorneys for or other agents for Defendants to the extent not already produced.
2. All letters, e-mails, telecopies, drafts, or other documents (including any attachments thereto) reflecting any communication that relates to the AUGS Position Statement on Mesh Midurethral Slings for Stress Urinary Incontinence.
3. A copy of your curriculum vitae.
4. Any and all documents ever provided to you by Defendant manufacturers with regard to any of their products including but not limited to Directions for Use, Instructions for Use, patient brochures, physician brochures, marketing literature, sales literature, implantation videos, and any and all correspondence between you and Defendant.

CERTIFICATE OF SERVICE

I certify that on August 12th, 2014, I electronically filed this documents with the Clerk of Court using the CM/ECF system which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

Certified to the 12th day of August, 2014 by:

/s/ Thomas P. Cartmell